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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**DECLARATION OF DEAN M.
HARVEY IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF EXHIBIT C AND
ATTACHMENT 1 TO THE
SETTLEMENT AGREEMENT**

1 I, Dean M. Harvey, declare:

2 I am a partner in the law firm of Lief, Cabraser, Heimann & Bernstein, LLP, a member of
3 the State Bar of California, and am admitted to practice before the United States District Court for
4 the Northern District of California. I am one of the counsel for Plaintiffs in this action. I make
5 this declaration based on my own personal knowledge. If called upon to testify, I could and
6 would testify competently to the truth of the matters stated herein.

7 1. I have electronically filed under seal true and correct unredacted versions of
8 Exhibit C and Attachment 1 pursuant to the Court's procedures for requesting a sealing order.

9 2. Attached hereto as Exhibit 1 is a true and correct copy of the Fifth Circuit's
10 October 16, 2013 order issued in *In re Deepwater Horizon – Appeals of the Economic and*
11 *Property Damage Class Action Settlement*, Case 13-30095 (5th Cir.),

12 3. Attached hereto as Exhibit 2 is a true and correct copy of the Settlement
13 Agreement in *In re AXA Rosenberg Investor Litig.*, Case 11-00536-JSW (N.D. Cal. Nov. 1, 2011)
14 (Dkt. 59).

15 4. Attached hereto as Exhibit 3 is a true and correct copy of the district court's
16 December 6, 2011 preliminary approval order issued in *In re AXA Rosenberg Investor Litig.*, Case
17 11-00536-JSW (N.D. Cal.).

18 5. Attached hereto as Exhibit 4 is a true and correct copy of the district court's April
19 2, 2012 final approval order issued in *In re AXA Rosenberg Investor Litig.*, Case 11-00536-JSW
20 (N.D. Cal.).

21 6. Attached hereto as Exhibit 5 is a true and correct copy of the district court's May
22 1, 2008 preliminary approval order issued in *Amochaev et al. v. Citigroup Global Markets, Inc.*,
23 Case 05-cv-01298-PJH (N.D. Cal.).

24 7. Attached hereto as Exhibit 6 is a true and correct copy of the January 16, 2013
25 Order Granting Lead Plaintiffs' Application to File Under Seal, issued in *In re A-Power Energy*
26 *Generations Sys., LTD. Sec. Litig.*, Case No. 2:11-ML-2302 GW (C.D. Cal.).

27 8. Attached hereto as Exhibit 7 is a true and correct copy of the trial court's May 30,
28 2008 sealing order in *John Muir Uninsured Healthcare Cases*, J.C.C.P. 4494 (Cal. Super. Ct.).

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct.

3 Executed this 22nd day of May, 2014, in San Francisco, California.

4 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

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6 By: /s/ Dean M. Harvey
Dean M. Harvey